

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE: VALSARTAN
PRODUCTS LIABILITY LITIGATION

THIS DOCUMENT RELATES TO
ALL CASES

MDL No. 2875

Civil No. 19-2875 (RBK/JS)

**NOTICE OF VOLUNTARY DISMISSAL WITHOUT PREJUDICE AS TO
PERIPHERAL DEFENDANT NUCARE PHARMACEUTICALS, INC.**

WHEREAS the Court entered Case Management Order No. 15, which provides a mechanism for certain defendants to obtain a without prejudice dismissal from all cases pending in this MDL alleging claims in connection with allegedly contaminated valsartan-containing drugs (“VCDs”);

WHEREAS, Peripheral Defendant NuCare Pharmaceuticals, Inc. (“NuCare”) having provided the information and documents required by Case Management Order No. 15, and having agreed to the tolling provisions therein;

IT IS HEREBY STIPULATED AND AGREED between Plaintiffs Executive Committee and NuCare that all current cases pending and all future cases to be filed in this MDL alleging claims against NuCare in connection with allegedly contaminated VCDs be and hereby are dismissed without prejudice.

/s/ George Williamson
On behalf of Plaintiffs’ Executive Committee

/s/ Beth S. Rose
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NuCare Pharmaceuticals, Inc.

Dated: January 30, 2020

Dated: November 8, 2019